

**HOFLAND & TOMSHECK**

Jason F. Carr, Esq.  
Nevada State Bar No. 6587  
josht@hoflandlaw.com  
228 South Fourth Street, 1<sup>st</sup> Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 895-6760  
Facsimile: (702) 731-6910

Appointed counsel for **Marcus Antonio Zamudio-Orozco**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS ANTONIO ZAMUDIO-OROZCO,

Defendant.

Case No. 2:23-cr-00058-JCM-VCF

**STIPULATION TO CONTINUE  
SENTENCING  
(THIRD REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Jason F. Carr, Esq., CJA appointed counsel for Marcus Antonio Zamudio-Orozco, that the sentencing set for August 19, 2024, at 10:30 a.m. be vacated and set to a date and time convenient to this Court, but no sooner than thirty (30) days.

The Stipulation is entered into for the following reasons:

1. This is the third stipulation of the sentencing date.
2. That defendant Zamudio requests additional time to put together mitigating materials and to otherwise prepare for sentencing which will involve, from the defense perspective, a relatively complex criminal history issue.
3. That Mr. Zamudio personally requested this sentencing continuance because he is attempting to tie up personal local matters before serving his federal sentence.

1           4. That defense counsel is still receiving mitigating materials including a copy of  
2           the civil lawsuit in which Mr. Zamudio is involved.

3           5. That defense counsel had two intervening deadlines this week that took more  
4           time than anticipated. To wit: Replies to Responses regarding pretrial motions,  
5           due and filed on August 13, 2024, in a District of Nebraska case, *United States*  
6           *v. Chandran and Lee*, 4:22-cr-3077; and a Reply Brief to the Nevada Court of  
7           Appeals due on August 16, 2024, in *Baker v. State*, No. 87450.

8           6. That pending deadlines prevented counsel from being able visit Mr. Zamudio  
9           this week in order to prepare him for sentencing.

10          For these reasons, the parties respectfully request the sentencing date be continued.

11          DATED this 15th Day of August, 2024.

12          HOFLAND AND TOMSHECK

JASON M. FRIERSON  
United States Attorney

13  
14          /s/ Jason F. Carr  
15          By: \_\_\_\_\_  
16          JASON F. CARR, ESQ.  
CJA Counsel Zamudio-Orozco

/s/ Edward G. Veronda  
By: \_\_\_\_\_  
EDWARD G. VERONDA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARCUS ANTONIO ZAMUDIO-OROZCO,

7 Defendant.

Case No. 2:23-cr-00058-JCM-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

8  
9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
11 Court finds that:

12 The Stipulation is entered into for the following reasons:

- 13 1. This is the third stipulation of the sentencing date.
- 14 2. That defendant Zamudio requests additional time to put together mitigating  
15 materials and to otherwise prepare for sentencing which will involve, from the  
16 defense perspective, a relatively complex criminal history issue.
- 17 3. That Mr. Zamudio personally requested this sentencing continuance because he  
18 is attempting to tie up personal local matters before serving his federal sentence.
- 19 4. That defense counsel is still receiving mitigating materials including a copy of  
20 the civil lawsuit in which Mr. Zamudio is involved.
- 21 5. That defense counsel had two intervening deadlines this week that took more  
22 time than anticipated. To wit: Replies to Responses regarding pretrial motions,  
23 due and filed on August 13, 2024, in a District of Nebraska case, *United States*  
24 *v. Chandran and Lee*, 4:22-cr-3077; and a Reply Brief to the Nevada Court of  
25 Appeals due on August 16, 2024, in *Baker v. State*, No. 87450.

1           6. That pending deadlines prevented counsel from being able visit Mr. Zamudio  
2           this week in order to prepare him for sentencing.

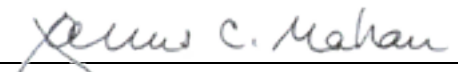
3                           **CONCLUSIONS OF LAW**

4           The ends of justice served by granting said continuance outweigh the best interest of the  
5 public and the defendant since the failure to grant said continuance would deny the parties  
6 herein sufficient time and the opportunity within which to be able to effectively and thoroughly  
7 prepare for sentencing, taking into account the exercise of due diligence.

8                           **ORDER**

9           IT IS THEREFORE ORDERED that the sentencing currently scheduled for  
10 August 19, 2024, at the hour of 10:30 a.m., be vacated and continued to **September 27, 2024,**  
11 **at 10:00 a.m.**

12           DATED August 16, 2024.

13  
14                             
15                           \_\_\_\_\_  
16                           UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26